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14 *Attorney for Plaintiff*  
15 *Secure Cam, LLC*

16 **UNITED STATES DISTRICT COURT**  
17 **NORTHERN DISTRICT OF CALIFORNIA**

18 Secure Cam, LLC, a Wyoming Limited )  
19 Liability Company ) Case No. 5:18-cv-02407-EJD  
20 Plaintiff, )  
21 v. )  
22 Anviz Global, Inc. ) **EX PARTE APPLICATION TO**  
23 Defendant. ) **CONTINUE INITIAL CMC TO AUGUST**  
24 ) **9, 2018; [PROPOSED] ORDER**

25 **TO THE CLERK OF THE COURT AND ALL PARTIES PREVIOUSLY**  
26 **APPEARING:**

27 Pursuant to Civil Local Rule 7-10, Plaintiff Secure Cam, LLC by and through its  
28 undersigned counsel, hereby requests that the initial Case Management Conference in this  
matter, currently set for August 2, 2018 at 10:00 a.m. be continued for seven days to August  
9, 2018 at 10:00 a.m. for the reasons described further herein.

1 Plaintiff Secure Cam, LLC presently has three matters pending before Honorable  
2 Judge Edward Davila. These include the instant matter, as well as *Secure Cam, LLC v.*  
3 *Butterfleye, Inc.* (5:18-cv-02600-EJD)(“Butterfleye”) and *Secure Cam, LLC v. Tend*  
4 *Insights, LLC* (5:18-cv-2750-EJD)(“Tend”). The case management conferences for Tend  
5 is presently set for August 9, 2018 at 10:00 and counsel for Tend has indicated that it cannot  
6 move the August 9th CMC to August 2<sup>nd</sup>.

7 Plaintiff seeks to hold the relevant CMCs for all three cases on the same date, in an  
8 effort to conserve the resources of counsel and the judiciary. As such, Secure Cam, LLC  
9 hereby requests that the CMC in this matter be reset to August 9, 2018, to coincide with the  
10 previously scheduled CMC in Tend. Though *Anviz* has been served in this matter, it has  
11 not yet answered.

12 Secure Cam, LLC will concurrently file a request in Butterfleye to continue the CMC  
13 in that matter to August 9, 2018 as well.

14 The above-stated facts are set forth in the accompanying Declaration of Nicholas  
15 Ranallo in Support of Ex Parte Application to Continue Case Management Conference,  
16 filed concurrently herewith.

17 Dated: July 17, 2018

18 Respectfully submitted,

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22 /s/ Nicholas Ranallo  
23 Nicholas Ranallo, Attorney at Law  
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1  
2 **[PROPOSED] ORDER CONTINUING CASE MANAGEMENT CONFERENCE**  
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4 Based on the foregoing Ex Parte Application for Continuance of Case Management  
5 Conference and Declaration of Nicholas Ranallo submitted in connection therewith, and  
6 good cause being shown, the Court orders a continuance of the initial Case Management  
7 Conference in this matter from August 2, 2018 at 10:00 a.m. to August 9, 2018, at 10:00  
8 a.m. A Joint Case Management Statement shall be due on August 2, 2018.  
9

10 SO ORDERED.  
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12 Dated \_\_\_\_ of July, 2018  
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Hon. Edward J. Davila  
U.S. District Judge  
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